



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

DEC 20 2002

Mr. Robert M. Houston  
Chief Veterinary Officer  
Department of Agriculture and Rural Development  
Veterinary Service  
Dundonald House, Upper Newtownards Road  
Belfast BT4 3SB  
Northern Ireland

Dear Mr. Houston:

Enclosed is a copy of the final report of the Food Safety and Inspection Service (FSIS) August 2-7, 2002, audit of Northern Ireland's meat inspection system. We received your letter dated December 3, 2002, providing detailed comments to our draft final report of the same audit. This letter has been incorporated into the enclosed report as Attachment "G."

We have thoroughly reviewed your comments and, where appropriate, made minor revisions to the audit report to clarify the findings of the FSIS auditor. We appreciate your feedback, as we believe it is this type of dialogue that enhances the equivalence of our food regulatory systems. In reviewing your comments, I recognize there is a difference of opinion between the FSIS auditor and the Government of Northern Ireland regarding the validity of some of the FSIS audit findings. In that regard, we fully support our auditor's findings and appreciate the Government of Northern Ireland concurring with the auditor's conclusion regarding the non-relisting of Northern Ireland's Establishment 9014 to export meat to the United States.

In regard to FSIS' decision not to accept further establishment certifications by the Government of Northern Ireland until we conduct a full on-site system audit of your meat inspection system, we accept your request, as stated in your December 3 letter, to further discuss this issue. We will arrange through our embassy in London a teleconference with you in early January 2003. Notwithstanding our acceptance, we restate our concerns about the Government of Northern Ireland to adequately certify establishments as meeting U.S. import requirements; based on the results of this audit.

As you know, in a June 18, 2002, letter, the Government of Northern Ireland requested FSIS to conduct an on-site audit of Establishment 9014. In that letter, Mr. R. M. McCracken, Chief Veterinary Officer, Department of Agriculture and Rural Development, inquired whether the FSIS auditor, who would be conducting a system audit of the Republic of Ireland's meat inspection system in mid-July, would have the opportunity to travel to Northern Ireland and audit Establishment 9014. As I indicated to you in my letter of October 11, 2002, FSIS does not usually audit a foreign inspection system consisting only of establishment reviews. Nonetheless, we agreed to review this one establishment to accommodate the Government of Northern Ireland considering the circumstances under which it was facing.

FSIS audits of a foreign country's food regulatory system are taken very seriously by our Agency, the U.S. Department of Agriculture, and U.S. Congress as FSIS has the responsibility to ensure that meat, poultry, and egg products imported into the United States are safe and wholesome as domestic products. Again, as I advised you in my October 11 letter, FSIS system audits focus on two essential components of safe food production that must be present in a foreign food regulatory system; *process controls* of a foreign establishment, and *oversight* by the foreign government to verify the effectiveness of industry process controls, detect noncompliance, and provide the necessary enforcement. Countries eligible to export meat, poultry, or egg products to the United States must meet this fundamental level of protection to maintain equivalence. If equivalence is not maintained, FSIS can immediately suspend a country from importing its products into the United States.

Although FSIS agreed to audit Establishment 9014, it did not lessen the oversight responsibility by the Government of Northern Ireland to make certain that this establishment is executing adequate process controls of safe food production. Once the Government of Northern Ireland requested FSIS to audit Establishment 9014, it is our supposition that this establishment's process controls had been verified by the Government of Northern Ireland as meeting all U.S. import requirements.

However, the FSIS audit indicated otherwise, and both FSIS and the Government of Northern Ireland agreed that Establishment 9014 should not be relisted to export meat to the United States. Unfortunately, the audit finding of inadequate process controls in Establishment 9014 also highlighted the possibility of a fundamental weakness in the Government of Northern Ireland's oversight responsibility. FSIS could have suspended Northern Ireland from importing its meat products into the United States, but decided to take the lesser action of accepting no further establishment certifications by the Government of Northern Ireland until FSIS conducts a full system audit of Northern Ireland's meat inspection system.

We appreciate your understanding of FSIS' decision and will continue to work collaboratively with the Government of Northern Ireland to ensure that Northern Ireland maintains eligibility to export meat products to the United States and regains its authorization to certify additional establishments for export to the United States. I look forward to our January 2003 teleconference.

Sincerely,



Sally Stratmoen  
Acting Director  
Equivalence Staff  
Office of International Affairs

Enclosure

cc. Peter Kurz, Minister Counselor, American Embassy, London  
James Hughes, Agricultural Attaché, British Embassy, Washington, DC  
Joerg Niederberger, Agric./Consumer Affairs, EU Mission to the U.S.  
Norval Francis, Minister-Counselor, U.S. Mission to the EU in Brussels  
John Wilson, FAS Area Officer  
Dave Young, FAS  
Amy Winton, State Department  
Linda Swacina, Associate Administrator, FSIS  
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